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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
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LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**STIPULATION FOR ADJOURNMENT OF THE HEARING ON MOTION OF  
DEBTOR AND DEBTOR IN POSSESSION FOR AN ORDER,  
PURSUANT TO FED. R. BANKR. P. 2004, AUTHORIZING  
DISCOVERY FROM BARCLAYS CAPITAL INC.**

This Stipulation is entered into by and between Lehman Brothers Holdings Inc.,  
as Debtor and Debtor in Possession (the “Debtor”) and Barclays Capital Inc. (“Barclays”).

**RECITALS**

WHEREAS, on May 18, 2009, the Debtor filed a Motion of Debtor and Debtor in  
Possession For an Order, Pursuant To Fed. R. Bankr. P. 2004, Authorizing Discovery From  
Barclays Capital Inc. (Docket No. 3596) (the “Motion”);

WHEREAS, a hearing on the Motion and the objection deadline are scheduled for  
June 3, 2009 at 10:00 a.m. and May 29, 2009 at 4:00 p.m., respectively; and

WHEREAS, the Debtor and Barclays wish to adjourn the hearing on the Motion to the next regularly scheduled omnibus hearing in these cases, as set forth in the Third Notice of Establishment of Omnibus Hearing Dates Pursuant to Amended Case Management Order Implementing Certain Notice and Case Management Procedures (Docket No. 2971), and in accordance with the Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures (Docket No. 2837) (the “Case Management Order”).

NOW, THEREFORE, IT IS STIPULATED AND AGREED:

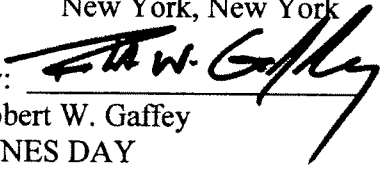
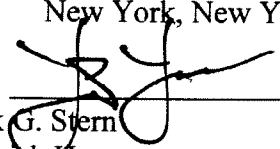
1. The hearing on the Motion is adjourned until **June 24, 2009 at 10:00 a.m. (Prevailing Eastern Time)**.

2. Objections, if any, to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Microsoft Word, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon: (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Jones Day, 222 East 41st Street, New York, New York 10017 (Attn: Robert W. Gaffey, William J. Hine, Jayant W. Tambe and Benjamin Rosenblum) and Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Richard P. Krasnow, Lori R. Fife, Shai Y.

Waisman, and Jacqueline Marcus), attorneys for the Debtors; (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Andy Velez-Rivera, Paul Schwartzberg, Brian Masumoto, Linda Riffkin, and Tracy Hope Davis); (iv) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Dennis O'Donnell, and Evan Fleck) and Quinn Emanuel Urquhart Oliver & Hedges, LLP, 51 Madison Avenue, 22nd Floor, New York, New York 10010 (Attn: Susheel Kirpalani), attorneys for the official committee of unsecured creditors appointed in these cases; and (v) Boies, Schiller & Flexner LLP, 575 Lexington Avenue, 7th Floor, New York, New York 10022 (Attn: Jonathan D. Schiller and Jack G. Stern), attorneys for Barclays Capital Inc., so as to be received no later than **June 5, 2009 at 4:00 p.m.** (Prevailing Eastern Time).

3. Responses or replies, if any, to any objection to the Motion shall be filed with the Court and served in accordance with the Case Management Order on or before **June 23, 2009 at 12:00 p.m. (Prevailing Eastern Time)**.

4. The adjournment of the hearing on the Motion under this Stipulation is without prejudice to any right, claim, remedy or defense of any of the parties with respect to the Motion.

<p>Dated: May <u>21</u>, 2009 New York, New York</p> <p>By:  Robert W. Gaffey JONES DAY 222 East 41st Street New York, New York 10017 Telephone: (212) 326-3939 Facsimile: (212) 755-7306</p> <p>ATTORNEYS FOR DEBTOR AND DEBTOR IN POSSESSION</p>	<p>Dated: May _____, 2009 New York, New York</p> <p>By:  Jack G. Stern Hamish Hume BOIES, SCHILLER &amp; FLEXNER LLP 575 Lexington Avenue New York, NY 10022 (212) 446-2300</p> <p>ATTORNEYS FOR BARCLAYS CAPITAL INC.</p>
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